

FORM EXEMPT UNDER 44 U.S.C. 3512

INTERNET
FORM NLRB-501
(2-08)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
5-CA-127521Date Filed
4/28/14

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer
BMT of DC

b. Tel. No. 888-602-4007

c. Cell No.

f. Fax No.

g. e-Mail

h. Number of workers employed

d. Address (Street, city, state, and ZIP code)

10233 S. Dolfield Road
Owings Mills, MD 21117

e. Employer Representative

(b) (6), (b) (7)(C)

i. Type of Establishment (factory, mine, wholesaler, etc.)
Ambulance Servicej. Identify principal product or service
Healthcare

k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

On (b) (6), (b) (7)(C) 2014 the employer disseminated a letter via email to all employees. In the letter, (b) (6), (b) (7)(C) revealed the confidential disciplinary record of the (b) (6), (b) (7)(C). We believe this is an attempt to damage the reputation of the (b) (6), (b) (7)(C) who is involved in organizing activities and an attempt to demonstrate that the union is unable to protect its members.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

International Association of EMT's and Paramedics / NAGE / SEIU Local 5000

4a. Address (Street and number, city, state, and ZIP code)

159 Burgin Parkway
Quincy, MA 02169

4b. Tel. No. (b) (6), (b) (7)(C)

4c. Cell No.

4d. Fax No.

4e. e-Mail

(b) (6), (b) (7)(C) @nage.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filed in when charge is filed by a labor organization) International Association of EMT's and Paramedics / NAGE / SEIU Local 5000

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(Signature)

(Print/type name and title or office, if any)

Tel. No. (b) (6), (b) (7)(C)

Office, if any, Cell No.

Fax No.

e-Mail

(b) (6), (b) (7)(C) @nage.org

Address

(b) (6), (b) (7)(C)

4-28-14

(date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

CHARGE ASSIGNMENT SHEET (EMPLOYER)

Case No.: 05-CA

CASE NAME: BMT of DC

DATE FILED: April 28, 2014

CATEGORY:

☐ I ☒ II ☐ III

Potential 10(j)
No

8(a)(2) (indicated name of
union):

discriminatees
8(a)(3): \

of Employees (if not currently on
charge) 17

IO charge? Yes: ☐ No: ☒

Dispute City: Washington

Dispute State: DC

COMMENTS:

Barg Status:

- ☐ Existing Contract
☐ Expired Contract
☐ Initial Contract
☐ None
☒ Organizational Campaign
☐ Succeeding Contract

SUPERVISOR: Crovella

AGENT: Godoy

8(a)(1)

- ☒ Coercive Actions (Surveillance, etc.)
☐ Coercive Rules
☐ Coercive Statements (Threats, Promises of
Benefits, etc.)
☐ Concerted Activities (Retaliation, Discharge,
Discipline)
☐ Denial of Access
☐ Discharge of supervisor (Parker-Robb Chevrolet)
☐ Interrogation (including Polling)
☐ Lawsuits
☐ Weingarten

8(a)(4)

- ☐ Changes in Terms and Conditions of Employment
☐ Discharge (including Layoff and Refusal to Hire)
☐ Discipline

☐ Refusal to Reinstate Employee/Striker

☐ Shutdown or Relocate/ Subcontract Unit Work

8(a)(5)

- ☐ Alter Ego
☐ Failure to Sign Agreement
☐ Refusal to Bargain/Bad Faith Bargaining (incl'g
surface bargaining/direct dealing)
☐ Refusal to Furnish Information
☐ Refusal to Hire Majority
☐ Refusal to Recognize
☐ Repudiation/Modification of Contract[Sec
8(d)/Unilateral Changes
☐ Shutdown or Relocate (e.g. First National
Maint.).Subcontract Work

8(a)(2)

- ☐ Assistance
☐ Domination
☐ Unlawful Recognition

8(a)(3)

- ☒ Changes in Terms and Conditions of Employment
☐ Discharge (Including Layoff and Refusal to Hire
(not salting))
☐ Discipline
☐ Lockout
☐ Refusal to Consider/Hire Applicant (salting only)
☐ Refusal to Reinstate E'ee/Striker (e.g. Laidlaw)
☐ Retaliatory Lawsuit
☐ Shutdown or Relocate/ Subcontract Unit Work
☐ Union Security Related Actions

8(e)

- ☐ All Allegations against a Labor Organization
☐ All Allegations against an Employer

Printed By UBH

From: [Godoy, Pablo A](#)
To: (b) (6), (b) (7)(C)
Subject: BMT of DC
Date: Monday, April 28, 2014 2:23:00 PM

(b) (6), (b) (7)(C),

I have been assigned to investigate the five charges that you filed against BMT of DC earlier this morning. I would like to schedule a time and date this week to meet with witnesses for the purpose of taking their affidavits and gather evidence. Please provide me the names and contact information of all witnesses for each of the five charges. In providing the list of names, please specify which charges each witness will present evidence on. Because the charges have not yet been docketed, provide a summary of the charge so that it can be identified.

I look forward to hearing from you.

Thank you,

Pablo A. Godoy

Field Attorney
National Labor Relations Board
Region 5 – Washington Resident Office
1099 14th Street NW, Suite 6300
Washington, DC 20570
Tel: (202) 208-3041
Fax: (202) 208-3013



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 5
BANK OF AMERICA CENTER, TOWER II
100 S. CHARLES STREET, STE 600
BALTIMORE, MD 21201

Agency Website: www.nlr.gov
Telephone: (410)962-2822
Fax: (410)962-2198



Download
NLRB
Mobile App

April 29, 2014

(b) (6), (b) (7)(C)

BMT of DC
10233 S. Dolfield Road
Owings Mills, MD 21117

Re: BMT of DC
Case 05-CA-127521

Dear **(b) (6), (b) (7)(C)**:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney Pablo A. Godoy whose telephone number is (202) 208-3041. The mailing address is 1099 14th Street, N.W., Suite 6300, Washington, DC 20570-0001. If Pablo A. Godoy is not available, you may contact Supervisory Field Attorney Linda Crovella whose telephone number is (202) 208-3040.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing Form NLRB-4701, Notice of Appearance. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent.

Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor any request to place limitations on our use of position statements or evidence beyond those prescribed by the Freedom of Information Act and the Federal Records Act. Thus, we will not honor any claim of confidentiality except as provided by Exemption 4 of FOIA, 5 U.S.C. Sec. 552(b)(4), and any material you submit may be introduced as evidence at any hearing before an administrative law judge. We are also required by the Federal Records Act to keep copies of documents gathered in our investigation for some years after a case closes. Further, the Freedom of Information Act may require that we disclose such records in closed cases upon request, unless there is an applicable exemption. Examples of those exemptions are those that protect confidential financial information or personal privacy interests.

Procedures: We strongly urge everyone to submit all documents and other materials (except unfair labor practice charges and representation petitions) by E-Filing (not e-mailing) through our website, www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. NLRB Form 4541 offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

Steven L. Shuster

Steven L. Shuster
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire

Revised 3/21/2011

NATIONAL LABOR RELATIONS BOARD

QUESTIONNAIRE ON COMMERCE INFORMATION

Please read carefully, answer all applicable items, and return to the NLRB Office. If additional space is required, please add a page and identify item number.

CASE NAME
BMT of DCCASE NUMBER
05-CA-127521**1. EXACT LEGAL TITLE OF ENTITY (As filed with State and/or stated in legal documents forming entity)****2. TYPE OF ENTITY**☐ CORPORATION ☐ LLC ☐ LLP ☐ PARTNERSHIP ☐ SOLE PROPRIETORSHIP ☐ OTHER (Specify)**3. IF A CORPORATION or LLC**A. STATE OF INCORPORATION
OR FORMATION

B. NAME, ADDRESS, AND RELATIONSHIP (e.g. parent, subsidiary) OF ALL RELATED ENTITIES

4. IF AN LLC OR ANY TYPE OF PARTNERSHIP, FULL NAME AND ADDRESS OF ALL MEMBERS OR PARTNERS**5. IF A SOLE PROPRIETORSHIP, FULL NAME AND ADDRESS OF PROPRIETOR****6. BRIEFLY DESCRIBE THE NATURE OF YOUR OPERATIONS (Products handled or manufactured, or nature of services performed).****7. A. PRINCIPAL LOCATION:****B. BRANCH LOCATIONS:****8. NUMBER OF PEOPLE PRESENTLY EMPLOYED**

A. Total:

B. At the address involved in this matter:

9. DURING THE MOST RECENT (Check appropriate box): ☐ CALENDAR YR ☐ 12 MONTHS or ☐ FISCAL YR (FY dates)A. Did you **provide services** valued in excess of \$50,000 directly to customers outside your State? If no, indicate actual value.
\$

YES NO

B. If you answered no to 9A, did you **provide services** valued in excess of \$50,000 to customers in your State who purchased goods valued in excess of \$50,000 from directly outside your State? If no, indicate the value of any such services you provided.
\$C. If you answered no to 9A and 9B, did you **provide services** valued in excess of \$50,000 to public utilities, transit systems, newspapers, health care institutions, broadcasting stations, commercial buildings, educational institutions, or retail concerns? If less than \$50,000, indicate amount. \$D. Did you **sell goods** valued in excess of \$50,000 directly to customers located outside your State? If less than \$50,000, indicate amount. \$E. If you answered no to 9D, did you **sell goods** valued in excess of \$50,000 directly to customers located inside your State who purchased other goods valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount.
\$F. Did you **purchase and receive goods** valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount. \$G. Did you **purchase and receive goods** valued in excess of \$50,000 from enterprises who received the goods directly from points outside your State? If less than \$50,000, indicate amount. \$H. **Gross Revenues** from all sales or performance of services (Check the largest amount)
☐ \$100,000 ☐ \$250,000 ☐ \$500,000 ☐ \$1,000,000 or more If less than \$100,000, indicate amount.I. **Did you begin operations within the last 12 months?** If yes, specify date: _____**10. ARE YOU A MEMBER OF AN ASSOCIATION OR OTHER EMPLOYER GROUP THAT ENGAGES IN COLLECTIVE BARGAINING?**☐ YES ☐ NO (If yes, name and address of association or group).**11. REPRESENTATIVE BEST QUALIFIED TO GIVE FURTHER INFORMATION ABOUT YOUR OPERATIONS**

NAME

TITLE

E-MAIL ADDRESS

TEL. NUMBER

12. AUTHORIZED REPRESENTATIVE COMPLETING THIS QUESTIONNAIRE

NAME AND TITLE (Type or Print)

SIGNATURE

E-MAIL ADDRESS

DATE

PRIVACY ACT STATEMENT

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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

BMT OF DC

Charged Party

and

**INTERNATIONAL ASSOCIATION OF EMT'S
AND PARAMEDICS/ NAGE/ SEIU LOCAL 500**

Charging Party

Case 05-CA-127521

AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, state under oath that on April 29, 2014, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

(b) (6), (b) (7)(C)

BMT of DC
10233 S. Dolfield Road
Owings Mills, MD 21117

April 29, 2014

Date

Deandria Spencer, Designated Agent of
NLRB

Name

/s/ Deandria Spencer

Signature



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 5
BANK OF AMERICA CENTER, TOWER II
100 S. CHARLES STREET, STE 600
BALTIMORE, MD 21201

Agency Website: www.nlr.gov
Telephone: (410)962-2822
Fax: (410)962-2198

April 29, 2014

(b) (6), (b) (7)(C)

International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500
159 Burgin Parkway
Quincy, MA 02169

Re: BMT of DC
Case 05-CA-127521

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on April 28, 2014 has been docketed as case number 05-CA-127521. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney Pablo A. Godoy whose telephone number is (202) 208-3041. The mailing address is 1099 14th Street, N.W., Suite 6300, Washington, DC 20570-0001. If Pablo A. Godoy is not available, you may contact Supervisory Field Attorney Linda Crovella whose telephone number is (202) 208-3040.

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If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

April 29, 2014

Procedures: We strongly urge everyone to submit all documents and other materials (except unfair labor practice charges and representation petitions) by E-Filing (not e-mailing) through our website www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website www.nlr.gov or from the Regional Office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

Steven L. Shuster

Steven L. Shuster
Acting Regional Director

Enclosure: Copy of Charge

cc: (b) (6), (b) (7)(C)
International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500
(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C) @butlermedicaltransport.com>
Sent: Saturday, March 22, 2014 1:21 PM
To: (b) (6), (b) (7)(C) @iaeplocal102.org
Cc: (b) (6), (b) (7)(C) (external)
Subject: FW: Email

From: (b) (6), (b) (7)(C)
Sent: Saturday, March 22, 2014 1:18 PM
To: All Butler Users
Cc: Louis J. Cannon Jr. (Baltimore) <Louis.Cannon@jacksonlewis.com>
Subject: Email

Yesterday, an e-mail about unions was sent using the Company's e-mail system. That e-mail did not relate to Company business. I want to remind you all that Company e-mail is not to be used for discussing outside groups, whether they be charities, unions or any other organization. This applies to everyone, regardless of whether they are for or against any of these organizations. I encourage you all to speak freely among yourselves about these issues. However, the Company is enforcing its long-standing policy of disallowing outside groups to be discussed using Company e-mail.

(b) (6), (b) (7)(C)

Sent from my iPhone

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C) @butlermedicaltransport.com>
Sent: Friday, March 21, 2014 8:49 AM
To: (b) (6), (b) (7)(C) @iaeplocal102.org
Subject: FW: Union at Butler

From: (b) (6), (b) (7)(C)
Sent: Friday, March 21, 2014 8:38 AM
To: All Butler Users
Subject: Union at Butler

Hello All,

I know there have been a lot of talk about the possibility of Butler becoming a Union. While this may sound Great (the idea of new units, equipment, raises); Keep in mind that is probably not going to be the reality of it. I am not in management but feel as a co-worker we should be educated on the flip side of this union idea. I have done a lot of research and talked to a lot of Union Educated people, as well as Union Members of this particular union. So please before you decide to vote or not vote as one of your coworkers; please make sure you educate yourselves. Here are a few important facts you may want to know:

1. If you decide not to vote at all; your vote will automatically mean "yes"; so make sure you vote!
2. If the union passes...we will ALL have to pay union dues whether you want to be a part of it or not...It's not an option!
3. Union dues can range anywhere upwards up of \$100 per pay...We don't know how much we will be paying.
4. If the Union would tell us to strike...We all legally have to strike, which means NONE of us would get paid during that time. Try telling your bill collectors your company is on strike and you can't pay bills that month; I'm sure they will understand (please sense the sarcasm)!
5. Butler will no longer be able to give out Gift Cards for extra shift, good jobs, etc. No more EMS week gifts, games. This will also mean no more Holiday Parties that we all enjoy @ It will strictly be all business and no more fun!
6. This is a small company; not a large fire dept. Just because we request new units, bigger raises, new uniforms; does not mean we will get any of these. Butler would have to agree to each and everything the union requests. In other words..just because the union wants to fight for something does not mean Butler will agree to it! Also keep in mind with paying union dues you will probably still be making a lot less with having to pay union dues then before any raises prior to union.
7. You will no longer be able to work in Multiple jobs here at Butler if the union passes. For example: Dispatchers will not be able to work road shifts anymore.
8. I have talked to some DC employees in this Union who have personally told me this union has done nothing for them.
Just some food for thought! Make sure you educate yourselves on everything and please remember if it comes to Vote..your opinion counts...Please Vote!!



*Learn the truth about Organized Labor and
how it will **Benefit** the employees of
Butler Medical Transport, LLC*

On Friday March 21, an email was sent to all of us from (b) (6), (b) (7)(C) about the International Association of EMTs and Paramedics (IAEP) which is currently helping Butler Medical Transport LLC employees organize into a local so that you can all have the opportunity to receive better wages, benefits and to see improvements in your daily working environment.

(b) (6), (b) (7)(C) presented, what we are supposed to believe, (b) (6), (b) (7)(C) personal views on the Union. Everyone is entitled to their opinion, which is one of the great things about America. If the email was truly (b) (6), (b) (7)(C) opinion and not one of Butler Management, we respect (b) (6), (b) (7)(C) right to express it.

However, whoever wrote the email is not entitled to disseminate incorrect information or outright lies to scare you into thinking the union is not beneficial to all of us. To that end, we, your co-workers in the Butler family of companies who are already members of the IAEP, would like to present you with the correct information and a little history of our experience to date.

Last July the EMT's at BMT of DC decided that we needed union representation. We contacted the IAEP, collected interest cards, filed for certification, held a vote, and decided 9 to 2 to organize a local of the IAEP. Our local election was certified by the federal government in November. Since that time, the IAEP has:

- Protected one employee from managements egregious attempts to terminate (b) (6), (b) (7)(C) on two separate occasions;
- Got the company to stop filling a full time position with a salaried member of management, thus protecting a job meant for a union member;
- Filed a complaint and got the company to recognize their last minute changes to our holiday schedule was inappropriate, causing the company to work with us so that we all could enjoy Christmas while being sure operations were not affected;
- Protested when BMT of DC employees were invited, then **UNINVITED** from the annual holiday celebration for two flimsy, transparent excuses. We were uninvited because the company was sore that we joined a union.

(b) (6), (b) (7)(C) made several points in (b) (6), (b) (7)(C) email, and most were either only half correct, and some were outright fabrications:

- **Not voting is not a yes vote.** Simply put, the majority of ballots cast is what determines whether or not the union represents you.
- Maryland does require that all employees in the group (in this case, EMTs and Paramedics) have to either pay the full union dues, or a reduced amount to cover the costs associated with contract negotiations. This is called a "closed shop." If you choose to not belong to the union, you still get all the negotiated benefits in the contract, you just do not get to turn to the union for representation if you are disciplined or fired;
- Once a union is certified to represent a group of employees, Butler **HAS TO** negotiate and come to an agreement on the locals requests. It is **SIMPLY UNTRUE** that Butler doesn't have to agree with reasonable requests from the union. If they fail to negotiate in "good faith" the National Labor Relations Board can and will force them to accept a contract that is beneficial to the workers.
BUTLER HAS TO COME TO THE TABLE AND NEGOTIATE WITH THE UNION.



*Learn the truth about Organized Labor and
how it will **Benefit** the employees of
Butler Medical Transport, LLC*

- **UNION DUES ARE NOT \$100 per paycheck!** Being (b) (6), (b) (7)(C) never contacted us to ask us what they were, (b) (6), (b) (7)(C) would have no way of knowing. **You don't pay ANY dues** until a contract is ratified, and there is **NO INITIATION FEE.** Currently at BMT of DC we don't pay any dues. Once we have a contract we will pay **\$11.20 a week for full timers, and \$9.20 a week for part timers.** In weeks you don't work, you don't pay.
- In the entire history of the IAEPs existence, there has only ever been one strike. We all take our jobs as EMS professionals seriously, and a strike would be unlikely. **The union CANNOT tell a local to strike!** The local decides as a group to do so through membership meetings and voting to strike.
- There is nothing in any union contract, nor would there be unless the membership of the local voted for it, that would prohibit management from holding a holiday party, events for EMS week, or their ability to give gift cards and other rewards for a job well done. **No union WOULD EVER** want their members to get less.
- **Butler is NOT a small company.** It is several small to medium size companies and in total has close to 400 employees. They are organized into several small companies so that when you work a shifts on the road, shifts in dispatch or shifts at Children's you don't get overtime, because they say you are working for "different companies." If working for different Butler companies was something the local members want to keep doing, then your negotiating team simply makes sure it's in the contract.

NO CONTRACT IN THE IAEP IS EVER NEGOTIATED WITHOUT THE LOCAL PRESIDENT IN ATTENDANCE TO BE SURE THE MEMBERS ARE PROPERLY REPRESENTED! The local members have complete control over what is asked for and what you accept in a contract. The point is for you to get what you want in the contract so you can have a quality, **SAFE** working experience and a paycheck that will allow you to pay your bills, prosper in your life, and support your family, and provide you with protection from management's overreaching and inappropriate discipline.

We hope this clears up many of the rumors and misinformation that is currently circulating through the company. If you have any questions, please do not hesitate to contact any of us listed below, anytime at all. We are here to help you to work through this process and to enjoy the many benefits we at BMT of DC already enjoy, thanks to the IAEP.

(b) (6), (b) (7)(C)@iaeplocal102.org
(b) (6), (b) (7)(C), Local 102
(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)@iaeplocal102.org
(b) (6), (b) (7)(C) Local 102
(b) (6), (b) (7)(C)

Michael Stone (mstone@nape.org)
IAEP Nat'l Director of Organizing
(b) (6), (b) (7)(C)

From: [Godoy, Pablo A](#)
To: [Region 5, Baltimore](#)
Subject: FW: Cases 05-CA-127698, 05-CA-127521, 05-CA-127512
Date: Wednesday, May 7, 2014 10:32:28 AM
Attachments: [Notice of Appearance.pdf](#)

Please upload as NOA in cases 5-CA-127698; 5-CA-127521; and 5-CA-127512

Thank you

From: Cannon, Louis J., Jr. (Baltimore) [mailto:Louis.Cannon@jacksonlewis.com]
Sent: Wednesday, May 07, 2014 9:56 AM
To: Godoy, Pablo A
Subject: Cases 05-CA-127698, 05-CA-127521, 05-CA-127512

Mr. Godoy:

Please see the notices of appearance in the above cases. I understand the two other BMT charges that were assigned to you have been (or are being) withdrawn by the Charging Party. Thank you.

Louis Cannon

Louis J. Cannon, Jr.

[Jackson Lewis P.C.](#)

2800 Quarry Lake Drive
Suite 200
Baltimore, MD 21209
410.415.2056

Representing management exclusively in workplace law and related litigation

Confidentiality Note: This e-mail, and any attachment to it, contains privileged and confidential information intended only for the use of the individual(s) or entity named on the e-mail. If the reader of this e-mail is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that reading it is strictly prohibited. If you have received this e-mail in error, please immediately return it to the sender and delete it from your system. Thank you.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

BMT of DC,

Employer

and

INTERNATIONAL ASSOCIATION OF EMT's and
Paramedics / NAGE / SEIU Local 5000

CASE 05-CA-127698

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____

BMT of DC


IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☐ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Louis J. Cannon, Jr.	
MAILING ADDRESS: 2800 Quarry Lake Drive, Suite 200, Baltimore, MD 21209	
E-MAIL ADDRESS: louis.cannon@jacksonlewis.com	
OFFICE TELEPHONE NUMBER: 410-415-2056	
CELL PHONE NUMBER: 202-390-1572	FAX: 410-415-2001
SIGNATURE:  (Please sign in ink.)	
DATE: 5-7-14	

¹ IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

BMT of DC,

Employer

and

INTERNATIONAL ASSOCIATION OF EMT's and
Paramedics / NAGE / SEIU Local 5000

CASE 05-CA-127521

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____

BMT of DC

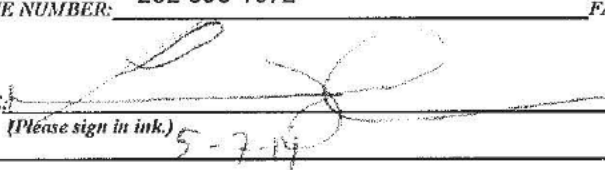
IN THE ABOVE-CAPTIONED MATTER.

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(REPRESENTATIVE INFORMATION)

NAME: Louis J. Cannon, Jr.	
MAILING ADDRESS: 2800 Quarry Lake Drive, Suite 200, Baltimore, MD 21209	
E-MAIL ADDRESS: louis.cannon@jacksonlewis.com	
OFFICE TELEPHONE NUMBER: 410-415-2056	
CELL PHONE NUMBER: 202-390-1572	FAX: 410-415-2001
SIGNATURE: 	
DATE: 5-7-14 <small>(Please sign in ink.)</small>	

¹ IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

BMT of DC,

Employer

and

INTERNATIONAL ASSOCIATION OF EMT's and
Paramedics / NAGE / SEIU Local 5000

CASE 05-CA-127512

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____
BMT of DC


IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☐ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Louis J. Cannon, Jr.	
MAILING ADDRESS: 2800 Quarry Lake Drive, Suite 200, Baltimore, MD 21209	
E-MAIL ADDRESS: louis.cannon@jacksonlewis.com	
OFFICE TELEPHONE NUMBER: 410-415-2056	
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From: (b) (6), (b) (7)(C)
To: [Godoy, Pablo A](#)
Subject: Re: BMT of DC
Date: Monday, May 12, 2014 10:44:12 AM

Please withdraw ULP 5-CA-127698 & ULP 5-CA-128216

Any questions please feel free to call me.

(b) (6), (b) (7)(C)

[Redacted]

@nage.org

On Friday, May 9, 2014 11:11 AM, "Godoy, Pablo A" <Pablo.Godoy@nlrb.gov> wrote:

(b) (6), (b) (7)(C),

Please give me a call to discuss the above-referenced charge.

Thank you,

Pablo A. Godoy

National Labor Relations Board
Region 5 - Washington Resident Office
1099 14th Street NW, Suite 6300
Washington, DC 20570
Tel: (202) 208-3041
Fax: (202) 208-3013

Form NLRB - 501 (2-08)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

FIRST AMENDED CHARGE AGAINST EMPLOYER

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE

Case	Date Filed
05-CA-127521	5/13/14

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring

1 EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Butler Medical Transportation, LLC		b. Tel. No. (888)602-4007
		c. Cell No.
d. Address (street, city, state ZIP code) 10233 S. Dolfeld Road Owings Mills MD 21117	e. Employer Representative (b) (6), (b) (7)(C)	f. Fax No. (888)602-4006
		g. e-Mail
		h. Dispute Location (City and State) Owings Mills, MD
i. Type of Establishment (factory, nursing home, hotel) Ambulance Service	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 250

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

On or about (b) (6), (b) (7)(C) 2014, the above-named Employer, by its officers, agents, and/or representatives, disseminated a letter via e-mail to employees, wherein the Employer revealed the confidential disciplinary record of the (b) (6), (b) (7)(C) to undermine the Union and to coerce employees from engaging in Union activities.

By these and other acts, the above-named Employer has coerced employees from exercising the rights guaranteed to them under Section 7 of the Act.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

International Association of EMT's and Paramedics/ NAGE/ SEIU Local 500

4a. Address (street and number, city, state, and ZIP code) 159 Burgin Parkway Quincy, MA 02169	4b. Tel. No. (b) (6), (b) (7)(C)
	4c. Cell No.
	4d. Fax No.
	4e. e-Mail

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

International Association of EMT's and Paramedics/ NAGE/ SEIU Local 500

6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge.		Tel. No. (b) (6), (b) (7)(C)
By, (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	Office, if any, Cell No.
(signature)	Print Name and Title	Fax No.
Address (b) (6), (b) (7)(C)	Date 5/13/14	e-Mail

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 5
BANK OF AMERICA CENTER, TOWER II
100 S. CHARLES STREET, STE 600
BALTIMORE, MD 21201

Agency Website: www.nlrb.gov
Telephone: (410)962-2822
Fax: (410)962-2198

May 14, 2014

Louis J. Cannon, Jr., Esq.
Gil A. Abramson, Esq.
Jackson Lewis, P.C.
2800 Quarry Lake Drive, Suite 200
Baltimore, MD 21209-3763

Re: Butler Medical Transportation, LLC
Case 05-CA-127521

Dear Mr. Cannon and Mr. Abramson:

Enclosed is a copy of the first amended charge that has been filed in this case.

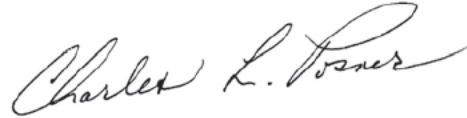
Investigator: This charge is being investigated by Field Attorney Pablo A. Godoy whose telephone number is (202) 208-3041. The mailing address is 1099 14th Street, N.W., Suite 6300, Washington, DC 20570-0001. If Pablo A. Godoy is not available, you may contact Supervisory Field Attorney Linda Crovella whose telephone number is (202) 208-3040.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

May 14, 2014

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

Very truly yours,

A handwritten signature in cursive script, reading "Charles L. Posner".

Charles L. Posner
Regional Director

Enclosure: Copy of first amended charge

cc:

(b) (6), (b) (7)(C)

Butler Medical Transportation, LLC
10233 S. Dolfield Road
Owings Mills, MD 21117

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

BUTLER MEDICAL TRANSPORTATION, LLC

Charged Party

and

**INTERNATIONAL ASSOCIATION OF EMT'S
AND PARAMEDICS/ NAGE/ SEIU LOCAL 500**

Charging Party

Case 05-CA-127521

AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on May 14, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

(b) (6), (b) (7)(C)

Butler Medical Transportation, LLC
10233 S. Dolfield Road
Owings Mills, MD 21117

Louis J. Cannon, Jr., Esq.
Gil A. Abramson, Esq.
Jackson Lewis, P.C.
2800 Quarry Lake Drive, Suite 200
Baltimore, MD 21209-3763

May 14, 2014

Date

Deandria Spencer, Designated Agent of
NLRB

Name

/s/ Deandria Spencer

Signature



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 5
BANK OF AMERICA CENTER, TOWER II
100 S. CHARLES STREET, STE 600
BALTIMORE, MD 21201

Agency Website: www.nlrb.gov
Telephone: (410)962-2822
Fax: (410)962-2198

May 14, 2014

(b) (6), (b) (7)(C)

International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500
159 Burgin Parkway
Quincy, MA 02169

Re: Butler Medical Transportation, LLC
Case 05-CA-127521

Dear (b) (6), (b) (7)(C):

We have docketed the first amended charge that you filed in this case.

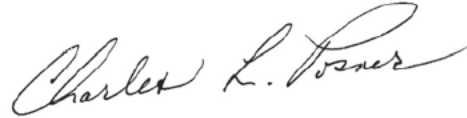
Investigator: This charge is being investigated by Field Attorney Pablo A. Godoy whose telephone number is (202) 208-3041. The mailing address is 1099 14th Street, N.W., Suite 6300, Washington, DC 20570-0001. If Pablo A. Godoy is not available, you may contact Supervisory Field Attorney Linda Crovella whose telephone number is (202) 208-3040.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

May 14, 2014

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

Very truly yours,



Charles L. Posner
Regional Director

Enclosure: Copy of Charge

cc:

(b) (6), (b) (7)(C)

International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500

(b) (6), (b) (7)(C)

AMENDED CHARGE ASSIGNMENT SHEET (EMPLOYER)

Case No.: 5- CA

CASE NAME:

DATE FILED:

Category:

Potential 10(j):

REASON:

- ☐ Add Allegations
- ☒ Add/Remove Allegations
- ☐ Change in Body of Charge
- ☐ Deficiency on Charge
- ☐ Other
- ☒ Change in Parties' Name and/or Address
- ☐ Remove Allegations

Have all allegations been disposed of as a result of this action (i.e., withdrawn, dismissed, amended, deferred, settled, submitted to advice, or contained in an issued complaint)? (Must be answered)

☐ YES

☒ NO

Barg Status:

- ☐ Existing Contract
- ☐ Expired Contract
- ☒ Initial Contract
- ☐ None
- ☐ Organizational Campaign
- ☐ Succeeding Contract

COMMENTS:

8(a)(2)'s

8(a)(3)'s

of Employees (if not currently on charge)

SUPERVISOR:

AGENT:

LHC

Godoy

8(a)(1)

- ☐ Coercive Actions (Surveillance, etc)
- ☐ Coercive Rules
- ☒ Coercive Statements (Threats, Promises of Benefits, etc.)
- ☐ Concerted Activities (Retaliation, Discharge, Discipline)
- ☐ Denial of Access
- ☐ Discharge of supervisor (Parker-Robb Chevrolet)
- ☐ Interrogation (including Polling)
- ☐ Lawsuits
- ☐ Weingarten

8(a)(4)

- ☐ Changes in Terms and Conditions of Employment
- ☐ Discharge (including Layoff and Refusal to Hire)
- ☐ Discipline
- ☐ Refusal to Reinstate Employee/Striker
- ☐ Shutdown or Relocate/ Subcontract Unit Work

8(a)(2)

- ☐ Assistance
- ☐ Domination
- ☐ Unlawful Recognition

8(a)(5)

- ☐ Alter Ego
- ☐ Failure to Sign Agreement
- ☐ Refusal to Bargain/Bad Faith Bargaining (incl'g surface bargaining/direct dealing)
- ☐ Refusal to Furnish Information
- ☐ Refusal to Hire Majority
- ☐ Refusal to Recognize
- ☐ Repudiation/Modification of Contract[Sec 8(d)/Unilateral Changes
- ☐ Shutdown or Relocate (e.g. First National Maint.).Subcontract Work

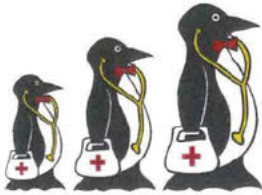
8(a)(3)

- ☐ Changes in Terms and Conditions of Employment
- ☐ Discharge (Including Layoff and Refusal to Hire (not salting))
- ☐ Discipline
- ☐ Lockout
- ☐ Refusal to Consider/Hire Applicant (salting only)
- ☐ Refusal to Reinstate E'ee/Striker (e.g. Laidlaw)
- ☐ Retaliatory Lawsuit
- ☐ Shutdown or Relocate/ Subcontract Unit Work
- ☐ Union Security Related Actions

8(e)

- ☐ All Allegations against a Labor Organization
- ☐ All Allegations against an Employer

Processed by WBM



BUTLER
MEDICAL TRANSPORT

8/20/13

Dear (b) (6), (b) (7)(C),

We have learned that a union has filed a petition with the National Labor Relations Board (NLRB) asking to be elected as your union at Children's National Medical Center. First, let us say that we are very disappointed that a handful of misguided employees apparently feel that you need a third party to represent you. Second, we want to make clear Butler Medical's position in this matter.

We firmly believe a union is unnecessary at our company and wouldn't be good for anyone but the union. Here are just a few reasons why:

1. Unions have destroyed jobs and business growth throughout this country.
2. Unions are sales organizations that thrive on collecting money from employees, and they make a lot of empty promises to convince employees to sign up.
3. Unions often insist that employees who refuse to have dues and fees deducted from their paychecks be fired—they put this in their contracts with companies! No BMT of DC employee should be forced to pay a union for the right to work here.
4. Having a union would mean that the company can no longer deal directly with you; it would have to go through the union. Do you want to lose your voice in the workplace?
5. Unions often want to trade flexibility for a rigid set of rules in a contract that everyone has to follow. Do you really want to be bothered with this?

This union has probably made you all kinds of promises about what it will get for you. Regardless of those promises, know this. If the union were to win the election, our only obligation would be to negotiate. The law makes clear that an employer is not required to agree to anything.

Over the coming weeks, we are going to provide you with a great deal of information about unionization, this union, the NLRB election process, what a union could cost you, what a union can't do for you, and why we feel you are being misled by a few disgruntled individuals. You may have been pressured into signing a union card. Just remember: even if you signed a card, you will have the right to VOTE NO in the election, which will be conducted by secret ballot. Nobody will know how you vote.

We believe that when you have all the facts in front of you, you will agree with the 93% of workers in the private sector who have decided that unionization is NOT in their best interests and NOT a worthwhile

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 5
BANK OF AMERICA CENTER, TOWER II
100 S. CHARLES STREET, STE 600
BALTIMORE, MD 21201

Agency Website: www.nlr.gov
Telephone: (410)962-2822
Fax: (410)962-2198

June 26, 2014

(b) (6), (b) (7)(C)

IAEP National Rep.
International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500

(b) (6), (b) (7)(C)

Re: Butler Medical Transportation, LLC
Case 05-CA-127521

Dear (b) (6), (b) (7)(C):

We have carefully investigated and considered your charge that Butler Medical Transportation, LLC has violated the National Labor Relations Act.

Decision to Dismiss: Based on that investigation, I have decided to dismiss your charge because there is insufficient evidence to establish a violation of the Act.

Your Right to Appeal: You may appeal my decision to the General Counsel of the National Labor Relations Board, through the Office of Appeals. If you appeal, you may use the enclosed Appeal Form, which is also available at www.nlr.gov. However, you are encouraged to also submit a complete statement of the facts and reasons why you believe my decision was incorrect.

Means of Filing: An appeal may be filed electronically, by mail, by delivery service, or hand-delivered. Filing an appeal electronically is preferred but not required. The appeal MAY NOT be filed by fax or email. To file an appeal electronically, go to the Agency's website at www.nlr.gov, click on **E-File Documents**, enter the **NLRB Case Number**, and follow the detailed instructions. To file an appeal by mail or delivery service, address the appeal to the **General Counsel at the National Labor Relations Board, Attn: Office of Appeals, 1099 14th Street, N.W., Washington D.C. 20570-0001**. Unless filed electronically, a copy of the appeal should also be sent to me.

Appeal Due Date: The appeal is due on **July 10, 2014**. If the appeal is filed electronically, the transmission of the entire document through the Agency's website must be completed **no later than 11:59 p.m. Eastern Time** on the due date. If filing by mail or by delivery service an appeal will be found to be timely filed if it is postmarked or given to a delivery service no later than July 9, 2014. **If an appeal is postmarked or given to a delivery service on the due date, it will be rejected as untimely.** If hand delivered, an appeal must be received by the General Counsel in Washington D.C. by 5:00 p.m. Eastern Time on the appeal due date. If an appeal is not submitted in accordance with this paragraph, it will be rejected.

Extension of Time to File Appeal: The General Counsel may allow additional time to file the appeal if the Charging Party provides a good reason for doing so and the request for an extension of time is **received on or before July 10, 2014**. The request may be filed electronically through the *E-File Documents* link on our website www.nlr.gov, by fax to (202)273-4283, by mail, or by delivery service. The General Counsel will not consider any request for an extension of time to file an appeal received after July 10, 2014, **even if it is postmarked or given to the delivery service before the due date**. Unless filed electronically, a copy of the extension of time should also be sent to me.

Confidentiality: We will not honor any claim of confidentiality or privilege or any limitations on our use of appeal statements or supporting evidence beyond those prescribed by the Federal Records Act and the Freedom of Information Act (FOIA). Thus, we may disclose an appeal statement to a party upon request during the processing of the appeal. If the appeal is successful, any statement or material submitted with the appeal may be introduced as evidence at a hearing before an administrative law judge. Because the Federal Records Act requires us to keep copies of case handling documents for some years after a case closes, we may be required by the FOIA to disclose those documents absent an applicable exemption such as those that protect confidential sources, commercial/financial information, or personal privacy interests.

Very truly yours,

/s/ Charles L. Posner

Charles L. Posner
Regional Director

Enclosure

cc: International Association of EMT's and
Paramedics/ NAGE/ SEIU Local 500
159 Burgin Parkway
Quincy, MA 02169

(b) (6), (b) (7)(C)

Butler Medical Transportation, LLC
10233 S. Dolfield Rd.
Owings Mills, MD 21117

Louis J. Cannon, Jr., Esq.
Gil A. Abramson, Esq.
Jackson Lewis, P. C.
2800 Quarry Lake Dr., Suite 200
Baltimore, MD 21209-3763

MEMORANDUM

TO: File

DATE: April 29, 2014

FROM: PABLO A. GODOY, FIELD ATTORNEY

RE: BMT of DC
Case 05-CA-127521

Case Log for 5-CA-127512 and 5-CA-127521 is located in lead case 5-CA-127493.

P.A.G.

Case Name: BMT of DC
Case No. 05-CA-127493
Agent: Field Attorney PABLO A. GODOY

CASEHANDLING LOG

[illegible]

(b) (5), (b) (7)(C) /14	(b) (6), (b) (7)(C)	In person	(b) (5), (b) (6), (b) (7)(C), (b) (7)(D)
5/06/14	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C)
5/06/14	(b) (6), (b) (7)(C)	In person	(b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C)
(b) (5), (b) (7)(C) /14	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C), (b) (7)(D)

			(b) (5), (b) (6), (b) (7)(C)
05/09/14	(b) (6), (b) (7)(C)	Phone	Called (b) (6), (b) (7)(C) and left voice message
05/09/14	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C)
05/09/14	Linda Crovella	In-person	(b) (5), (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)/14	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C)

05/12/14	(b) (6), (b) (7)(C)	E-mail	Received e-mail requesting withdrawal of 5-CA-127698 and 5-CA-128216
05/30/2014	Luis Cannon	Phone	(b) (5), (b) (6), (b) (7)(C)
05/30/2014	(b) (6), (b) (7)(C)	E-mail	(b) (5), (b) (6), (b) (7)(C)
06/23/2014	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C) (b) (5), (b) (6), (b) (7)(C)
06/24/2014	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C)
06/25/2014	(b) (6), (b) (7)(C)	Phone	(b) (5), (b) (6), (b) (7)(C)